

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

CONSOLIDATED INDUSTRIES, LLC
d/b/a **WEATHER KING PORTABLE**
BUILDINGS,

Plaintiff,

V.

Civil Action No. 1:22-cv-01230-STA-jay

JESSE A. MAUPIN, BARRY D. HARRELL, ADRIAN S. HARROD, LOGAN C. FEAGIN, STEPHANIE L. GILLESPIE, RYAN E. BROWN, DANIEL J. HERSHBERGER, BRIAN L. LASSEN, ALEYNA LASSEN, and AMERICAN BARN CO., LLC,

Chief Judge S. Thomas Anderson

Defendants.

**DECLARATION OF BARRY HARRELL IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFF'S MOTION FOR SANCTIONS**

I, Barry Harrell, submit this Declaration in support of Defendants' Opposition to Plaintiff's Motion for Sanctions. I, Barry Harrell under penalty of perjury, and pursuant to 28 U.S.C. §1746, declare as follows.

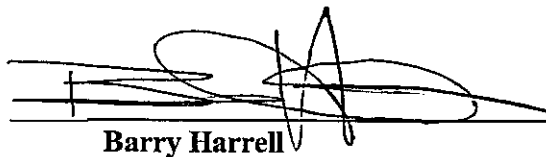
1. I reviewed the declaration of Mitchell Sykes and found several discrepancies.
2. First, I didn't "encourage and convince" him to leave Weather King, I simply told him that we were starting a new company and asked him if he'd like to join us. He began to cry and said that he would be honored to join us. Mitch was on the border of being terminated by Weather King. He had already been demoted and his salary cut by two thirds. He went from \$140,000 down to \$50,000. They were constantly giving him grief but were reluctant to fire him because his brother-in-law was David Sullivan's (Owner of Weather King) pastor and he (David Sullivan) didn't want that word to get out.

3. The Defendants in the lawsuit were fired, and did not resign, except for Stephanie Gillespie, who also quit.

4. Stephanie Gillespie and I never talked about American Barn Co. at anytime while employed at Weather King. We never talked about anything related to the business until we started American Barn Co. Mr. Sykes has never heard her and I talk about any of this because it simply did not take place. She is on the clerical side of the business and not the production or sales portion, so I did not, and had no reason to, talk to her about these matters whatsoever.

5. I did not talk to any of the drivers, dealers, or manufacturing plants about starting American Barn until after my termination.

I understand that the following statements in this Declaration are made subject to the penalties of 28 U.S.C. §1746.


Barry Harrell